

Exhibit

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RENALDO NAVARRO,)	CERTIFIED COPY
)	
Plaintiff,)	
)	
vs.)	Case No.
)	3:19-cv-08157-VC
MENZIES AVIATION, INC., DOING)	
BUSINESS AS MENZIES; and)	
DOES 1 through 10, inclusive,)	
)	
Defendants.)	
_____)	

Webex deposition of RENALDO NAVARRO, VOLUME I,
taken remotely on behalf of the Defendant, beginning at
9:41 a.m. and ending at 4:23 p.m., on Thursday,
July 23, 2020, before JOANNA B. BROWN, Certified
Shorthand Reporter No. 8570, RPR, CRR, RMR.

1 Q And did you graduate?

2 A Are you asking how long? How long, sir?

3 Q Yes.

4 A Yes, sir.

5 Q Did you attend any type of college or
6 university in the Philippines?

7 A Yes, sir.

8 Q Where was that?

9 A Philippine College of Criminology, but I did
10 not finish it.

11 Q Any other type of schooling in the Philippines
12 other than high school and what you just mentioned
13 prior to moving to the United States?

14 A No more, sir.

15 Q Can you please identify for me all of your
16 employers prior to Menzies Aviation since you
17 arrived -- well, let me start over.

18 After you moved to the United States, can you
19 please list all of your employers up to Menzies.

20 A In 2005, when I got here, I worked at
21 Service Fair part-time -- oh, Service Air part-time.
22 2005, in September, I started at ASIG Aviation. In
23 2005, where I worked for, it was purchased by
24 Swissport. It was purchased in 2015 by Swissport, and
25 in 2016, ASIG was purchased by Menzies.

1 different.

2 Q Okay. Did you ever have any type of
3 supervisory job at Service Air?

4 THE INTERPRETER: Please repeat the question.

5 MR. WARD: Sure.

6 Q At Service Air, did you have any type of
7 supervisory responsibilities?

8 A No, sir.

9 Q The only supervisory job you've had was at
10 ASIG and Menzies; right?

11 A Yes, sir.

12 Q Have you ever declared bankruptcy?

13 A No, sir.

14 Q Have you ever been convicted of a felony in
15 the United States?

16 A No, sir.

17 Q And you understand that Menzies purchased ASIG
18 at some point a couple of years ago; correct?

19 A 2016, sir.

20 Q While you were employed by ASIG, you were
21 promoted to supervisor; right?

22 A Yes, sir.

23 Q And at that time, were you given additional
24 job responsibilities as a supervisor?

25 A Yes, sir.

1 Q What did you understand those additional
2 responsibilities to include?

3 A First of all, with people. Before you were
4 with people and then you had to handle people, and
5 then -- and also, with the flight, you should be able
6 to distribute it to the people equally.

7 Q And when you say "distribute," are you talking
8 about distributing the amount of work across the people
9 you supervise equally?

10 A Yes, sir.

11 Q The supervisory job that you received at ASIG,
12 was it fuel?

13 THE INTERPRETER: I'm sorry. Was it what?
14 Hello?

15 MR. URIARTE: There's an audio issue.

16 THE INTERPRETER: I didn't get the complete
17 question.

18 MR. URIARTE: Chris, your screen -- Chris,
19 your screen shows a muted icon again.

20 MR. WARD: I just lost sound in here again.
21 Can you -- I cannot hear anything that anybody is
22 saying, but I think you can all hear me. Can somebody
23 nod their head yes.

24 MR. URIARTE: Yes.

25 THE INTERPRETER: Yes, yes.

1 BY MR. WARD:

2 Q How did you first learn about that petition?

3 A They passed it to me when they were -- after
4 they signed, they were passing that petition.

5 MR. URIARTE: Wait. I have to object on the
6 interpretation there. You might want to ask the
7 witness to state his response again because that's
8 definitely -- I think your English portion of that
9 interpretation is erroneous.

10 (Interpreted.)

11 THE WITNESS: Yes, sir.

12 MR. URIARTE: You have to -- can you provide
13 the answer again.

14 THE WITNESS: Please repeat your question.

15 BY MR. WARD:

16 Q My question was how did you first learn about
17 that petition?

18 A I learned from the people that they were
19 passing a petition against Andrew.

20 Q When you say the "people," who specifically
21 are you referring to?

22 A The fuelers, those who put the gasoline.

23 Q Okay. And when you learned that it was being
24 passed around, did somebody ask you to sign it?

25 A They told me. They told me.

1 Q They told you what?

2 A If I would like to sign it.

3 Q Okay. And who is the specific individual who
4 asked if you would like to sign it?

5 A I forgot the name of the person. There were
6 many people who approached me to sign it, but I already
7 forgot.

8 Q Can you identify any one fueler who approached
9 you by name?

10 A There were so many who approached me.

11 Q My question is different though.

12 Can you name one person who approached you and
13 asked you to sign the petition?

14 A Jezen Canlas.

15 Q Anybody else?

16 A There's two who are Rafael.

17 Q I'm sorry. Two individuals named Rafael?

18 A No. One, a steward, the name is Rafael.

19 Q What is Rafael's last name?

20 A I do not remember the last name, just Rafael.

21 Q Is there anybody else that you can identify
22 who asked you to sign the petition?

23 THE INTERPRETER: I'm sorry. Can you repeat
24 the question.

25 ///

1 BY MR. WARD:

2 Q Anybody else you can identify by name who
3 asked you to sign the petition?

4 A I forgot the others, but it was Jezen and
5 Rafael.

6 Q Did you sign the petition?

7 A Yes, sir.

8 Q Did you think it was appropriate to get
9 involved in a petition against another supervisor?

10 MR. URIARTE: Objection. Vague and calls for
11 a legal conclusion.

12 You can answer, Mr. Navarro. You can answer
13 after my objection.

14 THE WITNESS: Please repeat the question.

15 BY MR. WARD:

16 Q The question was did you think it was
17 appropriate to sign a petition against another
18 supervisor?

19 MR. URIARTE: Same objection.

20 THE WITNESS: Maybe because, you know -- just
21 on the right, you know.

22 BY MR. WARD:

23 Q I don't understand your answer, Mr. Navarro.

24 A If we know that what they are fighting for
25 against Andrew Dodge is right, so why not help them and

1 A Yes, sir.

2 Q If Andrew Dodge had complained to
3 nonsupervisory employees about you, do you think that
4 would have been appropriate for him to do so?

5 THE INTERPRETER: Please repeat that question.

6 MR. WARD: Sure.

7 Q If Andrew Dodge had complained to
8 nonsupervisory employees about you, do you think
9 Andrew Dodge would be acting appropriately?

10 MR. URIARTE: Objection. Lacks foundation.
11 Vague and incomplete hypothetical.

12 THE WITNESS: It depends on him. I do not
13 know what he is thinking of.

14 BY MR. WARD:

15 Q Now, prior to signing this petition, you had
16 previously submitted complaints about Mr. Dodge;
17 correct?

18 A Yes, sir.

19 Q When was that?

20 THE INTERPRETER: The interpreter would like
21 to inquire.

22 THE WITNESS: I no longer remember. The
23 people told me what Andrew was doing. So I had that --
24 I had that reported to the superiors.

25 ///

1 BY MR. WARD:

2 Q Okay. And when did you make these complaints
3 yourself about Andrew Dodge?

4 A I no longer remember the date, but I told
5 Randy Davis.

6 Q Anyone other than Randy?

7 THE INTERPRETER: I'm sorry. I didn't hear
8 that.

9 BY MR. WARD:

10 Q Anyone other than Randy?

11 A There were Nico, John Qually, and also Renil
12 and Tracy.

13 MR. URIARTE: Did you say Nicole?

14 THE WITNESS: Nico. Nico.

15 MR. URIARTE: Can you spell that.

16 THE WITNESS: Nico, N-i-c-o (In English).

17 THE INTERPRETER: This is the interpreter.

18 It's not Nicole but Nico, N-i-c-o.

19 BY MR. WARD:

20 Q All right. Other than Randy, Nico, Tracy, and
21 Renil, is there anyone else at Menzies/ASIG that you
22 told?

23 MR. URIARTE: I think, Chris, you are
24 misstating John Qually, and then the interpreter missed
25 saying Renil.

1 THE INTERPRETER: Yeah. I stand corrected. I
2 omitted Renil.

3 MR. WARD: Let's strike that question. I'll
4 ask it again.

5 Q So other than Randy Davies, Nico, Tracy,
6 Renil, and John Qually, is there anybody else who you
7 communicated complaints about Andrew Dodge to?

8 A No more.

9 Q How much time passed, approximately, between
10 when you communicated these complaints and when you
11 signed the petition?

12 A Maybe those are years. Years.

13 Q And in between when you communicated the
14 complaints and when you signed the petition, did you
15 make, yourself, any other complaints involving
16 Andrew Dodge?

17 A No more -- no, sir.

18 MR. URIARTE: Is this a good time for lunch?
19 We have lunch being delivered. So --

20 MR. WARD: We can go maybe for another 10 or
21 15 minutes first, if that's all right.

22 MR. URIARTE: That's okay. Yeah. Maybe --
23 yeah, closer to 10 hopefully.

24 MR. WARD: All right. I am going to mark
25 as Exhibit 7 a document which has the Bates Nos. -152

1 Q At the very bottom there, where it says
2 "...remember all people sign to that petition against
3 you but i never submit it yet," what did you mean when
4 you wrote "i never submit it yet"?

5 A What I meant there is because the petition
6 letter was given to me to be submitted to Raul Vargas,
7 I did not submit it; but the people told me that I
8 should submit the petition so that they would know what
9 Andrew was doing.

10 Q Who specifically told you that you should be
11 the one to submit the petition?

12 A Because, at that meeting, Raul Vargas was
13 there. He was our director. He said that we -- that I
14 submit it --

15 THE INTERPRETER: Just a second.

16 THE WITNESS: It's just, in that meeting, I
17 was told "Please give this to Raul Vargas."

18 BY MR. WARD:

19 Q And my question is who is the specific person
20 who told you to give it to Raul Vargas?

21 A I was just given the petition -- the petition
22 letter. I don't remember the person anymore. That's
23 why I just gave it to Raul.

24 Q Why did you delay in submitting the petition
25 after you were asked to do so?

1 A For myself, I pitied Andrew. For myself, I
2 thought about him, that he could still change.

3 Q Did you ever submit the petition after you
4 were asked to do so?

5 THE INTERPRETER: This is the interpreter. He
6 wants me to repeat.

7 THE WITNESS: After our meeting. After a few
8 days.

9 BY MR. WARD:

10 Q So, yes, you submitted this petition to
11 somebody at Menzies?

12 A Yes. To the director -- director of Menzies.

13 Q What was that person's name?

14 A Raul Vargas.

15 Q If you pitied Andrew, what made you decide to
16 then submit the petition?

17 THE INTERPRETER: Please repeat that,
18 Mr. Ward.

19 MR. WARD: Sure.

20 Q If you delayed in submitting the petition
21 because you pitied Andrew, why did you then decide to
22 submit it a few days later?

23 A I was told by the people to give the petition.
24 I was told by them to give the petition.

25 Q And these are nonsupervisory employees telling

1 DEPOSITION OFFICER'S CERTIFICATE

2 STATE OF CALIFORNIA)

) ss.

3 COUNTY OF ORANGE)

4

5 I, Joanna B. Brown, hereby certify:

6 I am a duly qualified Certified Shorthand
7 Reporter in the State of California, holder of
8 Certificate Number CSR 8570 issued by the Court
9 Reporters Board of California and which is in full
10 force and effect. (Fed. R. Civ. P. 28(a)).

11 I am authorized to administer oaths or
12 affirmations pursuant to California Code of Civil
13 Procedure, Section 2093(b) and prior to being examined,
14 the witness was first duly sworn by me.
15 (Fed R. Civ. P. 28(a), 30(f)(1)).

16 I am not a relative or employee or attorney or
17 counsel of any of the parties, nor am I a relative or
18 employee of such attorney or counsel, nor am I
19 financially interested in this action.
20 (Fed R. Civ. P. 28).

21 I am the deposition officer that
22 stenographically recorded the testimony in the
23 foregoing deposition, and the foregoing transcript is a
24 true record of the testimony given by the witness.
25 (Fed. R. Civ. P. 30(f)(1)).

1 Before completion of the deposition, review of
2 the transcript [XX] was [] was not requested. If
3 requested, any changes made by the deponent (and
4 provided to the reporter) during the period allowed,
5 are appended hereto. (Fed. R. Civ. P. 30(e)).

6

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8 Dated: August 4, 2020

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